



STATE OF NEW YORK  
OFFICE OF THE ATTORNEY GENERAL

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March 27, 2008

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**By Hand Delivery to:**

The Honorable Colleen McMahon  
United States District Judge  
United States District Court  
Southern District of New York  
500 Pearl Street  
New York, New York 10007

**MEMO ENDORSED**

Re: Thomas v. DOCS et al.  
08 Civ. 1495 (CMM)

Your Honor:

I am an Assistant Attorney General in the Office of Andrew M. Cuomo, Attorney General of the State of New York, counsel for defendants Stone and Mamis. An answer or motion in lieu of an answer on behalf of Mamis would be due on April 1 and on behalf of Stone on April 6, 2008. I write respectfully to request an extension of the time for the defendants to answer or otherwise move until April 30, 2008. The request is necessary in order to afford me time to review the complaint and relevant documents from the New York State Department of Correctional Services with the defendants in order to make a thorough response to the complaint. I do not believe that this request for an extension of time should require an adjournment of the pre-trial conference set for May 2, 2008 before this Court. No previous request for an extension of time to answer or otherwise respond to the complaint has been made. I did not seek the consent of plaintiff pro se as he is incarcerated and I wanted to make this request on behalf of defendants Stone and Mamis forthwith.

I thank the Court for its consideration in this matter.

Respectfully submitted,

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